

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA

REPUBLIC FIRE & CASUALTY  
INSURANCE COMPANY

CIVIL SUIT NO.: 1:16-cv-00171-DDD-JPM

VERSUS

CHIEF JUDGE DRELL

THE ESTATE OF LARRY W. JEANE, MAGISTRATE JUDGE PEREZ-MONTES  
SR., et al

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**MOTION TO DISMISS**

Defendants, THE ESTATE OF LARRY W. JEANE, SR. and JOHANNA JEANE,  
herein adopt by reference the “Motion to Dismiss” filed on behalf of Defendants,  
SARAH BARBER, JAMIE TURNER, ELIZABETH SPIVEY, and WALLACE SPIVEY  
(Doc. 21), and the exhibits and memorandum attached thereto, *see* Fed R. Civ. P. 10(c),  
and prays that the Court grant the Motion to Dismiss for the reasons set forth therein.

Respectfully submitted,

**FAIRCLOTH, MELTON & SOBEL, LLC**

By: /s/ Lauren Stokes Laborde

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**ATTORNEY FOR THE ESTATE OF  
LARRY W. JEANE, SR. AND  
JOHANNA JEANE**

**CERTIFICATE OF SERVICE**

I hereby certify and attest that a copy of the above and foregoing Motion to Dismiss has been served on all represented parties through the Court's electronic mail notification system.

Alexandria, Louisiana this 10<sup>th</sup> day of May, 2016.

/s/ Lauren Stokes Laborde